UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RELATED CASE STATEMENT

Local Civil Rule 13(b)(1)

A. Full caption of later-filed case:

JOSÉ ATILES and LAUREN SOLIN, on behalf of themselves and all others similarly situated,

Plaintiffs

VS.

EQUIFAX, INC. and EQUIFAX INFORMATION SERVICES LLC,

Defendants.

No. 17 CV 7493

B. Full caption of earlier-filed case(s) in this District:

JEREMY DAVIS, AMANDA GURTIS DAVIS, and JOHN HUGHES, individually and on behalf of all others similarly situated,

Plaintiffs

No. 1:17-cv-06883-VB

VS.

EQUIFAX, INC.,

Defendant.

LINDA TIRELLI and BROOKE MERINO, individually and on behalf of all others similarly situated,

Plaintiffs

VS.

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

No. 1:17-cv-06868-VB

AVI JOSHUA BITTON, individually and on behalf of all others similarly situated,

Plaintiff

VS.

EQUIFAX INFORMATION SERVICES LLC, and DOES 1 THROUGH 10,

Defendants.

No. 1:17-cv-06946-VB

BERNARD J. ZWEIG and FRANK PALUMBO, individually and on behalf of all others similarly situated,

Plaintiffs

VS.

EQUIFAX INC. and EQUIFAX INFORMATION SERVICES, INC.,

Defendants.

No. 1:17-cv-07090-VB

SHERVON FLORES and ELIO GUZMAN, individually and on behalf of all others similarly situated,

Plaintiffs

VS.

EQUIFAX INC.,

Defendant.

No. 1:17-cv-07088-VB

C. Status of Earlier-Filed Cases Statement of Reasons for Relatedness

This matter, the earlier-filed cases identified herein, and related proceedings are among more than 100 class actions filed against Equifax, Inc. and its affiliates and subsidiaries arising out of a data breach affecting more than 140 million U.S. consumers' sensitive and personal consumer files.

As alleged in the Complaint filed in this matter, Equifax failed to take the most basic measures to protect Plaintiffs and other affected consumers against known risks.

Plaintiffs contend these matters are related because the claims allege similar causes of action based on similar facts and seeking similar relief. All such actions are potentially subject to pending motions for transfer and consolidation before the Joint Panel on Multidistrict Litigation. In re: Equifax, Inc. Customer Data Security Breach Litigation, MDL 2800.

Dated: October 1, 2017

New York, NY

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